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May 28, 1992
File #965

Ms. Loukie Lofchie
Brunswick Area Citizens for a Safe Environment
P. O. Box 245
Brunswick, ME 04011

Subject: Review of "Draft Proposed Plan, Site 8, Perimeter Road Disposal Site", May 1992, Naval Air Station Brunswick, Brunswick, Maine.

Dear Ms. Lofchie:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Robert G. Gerber, Inc. has reviewed the "Draft Proposed Plan, Site 8, Perimeter Road Disposal Site", dated May 1992, that was prepared for the U. S. Department of the Navy for the Naval Air Station Brunswick, Brunswick, Maine. When we received the document at the last Technical Review Committee (TRC) meeting on May 20, 1992, Jim Shafer of the U. S. Navy's Northern Division pointed out that the above document is intended to be read and understood by the general public. As a result, comments on both the technical content and the "readability" would be appreciated. Our comments below reflect both concerns.

1. Page 1-2. The second sentence of the third paragraph should be revised to more clearly reflect the portion of the northern end of the base contributing surface run-off to the two small tributaries bordering Site 8. As currently written it seems to imply that the entire northern end of the base drains into the two tributaries.

2. Page 1-4. The addition of an explanation of the symbols for streams and vegetation to the legend on Figure 1-2 would be helpful to people unused to interpreting maps. An explanation of the small crosses and dots scattered on the figure should also be provided.

3. Page 2-4. What is the anticipated date that the Site 8 Record of Decision (ROD) described in Section 2.4 will be submitted to the Maine Department of Environmental Protection and the U. S. Environmental Protection Agency for review. A brief outline of what happens once the ROD is signed (design, construction, monitoring, etc.) should be added to the end of the section.

4. Page 3-3. References to the various studies performed in the 1980's should be cited and listed. Copies should be made available for the public to review.

Page 2, Draft Site 8 Proposed Plan,
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5. Page 3-3. The final sentence on the page states that 13 sites are currently being studied at the base, yet Figure 3-1 shows a Site 14. A brief clarification of the difference between the two numbers would be helpful.

6. Page 3-8. The first sentence in the second paragraph in Section 3.1.1 should be revised to reflect that groundwater also occurs in the bedrock underlying the overburden soil.

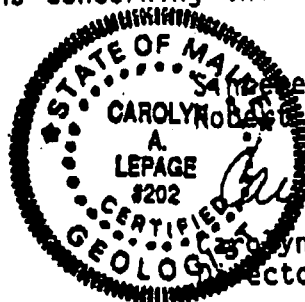
7. Page 3-10. A more detailed description of the occurrence of polynuclear aromatic hydrocarbons (PAHs) north and west of the site should be provided. Perhaps locations should be added to a map. Additional explanation is required to clarify why these PAHs may be related to subsurface run-off from Route 24 rather than Site 8.

8. Page 5-1. Will the nonpoint source areas thought to contribute to the elevated levels of iron, lead, cyanide, and aluminum be evaluated?

9. Page 6-1. The institutional controls described in the Minimal Action Alternative in Section 7.0 should also be included in the Navy's Preferred Alternative (installing a cap) to limit future activity and the potential for invasive activities at Site 8 should the Navy cease operations at the base. As discussed at the May 20th TRC meeting, the institutional controls should also include incorporating the location of the site into the Town of Brunswick's computerized database.

At the May 20th TRC meeting, alternative dates for the public hearing and public comment period were discussed without reaching a firm conclusion. Therefore, the dates presented in the above document may be changed. Regardless of dates selected, the BACSE group and other interested parties will have an opportunity to provide the Navy with both oral and written comments during the public hearing and public comment period respectively.

If you have any questions concerning the comments above, please do not hesitate to give us a call.



Carolyn A. Lepage, C.G.
Robert G. Gerber, Inc.

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